

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

Jeremy Paul Batts and Susan Beth Batts as )	
Co-Personal Representatives of the Estate )	
of Kaiea Spring Batts, Deceased )	CASE NUMBER: 2:23-cv-03565-DCN
)	
Plaintiff, )	
vs.  )	
)	
SNAP INC. d/b/a/ SNAPCHAT, INC., )	PLAINTIFFS' MOTION TO CONDUCT
Evan Spiegel and Emily White, )	JURISDICTIONAL DISCOVERY
)	
Defendants. )	
)	

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Plaintiffs Jeremy Paul Batts and Susan Beth Batts, as Co-Personal Representatives of the Estate of Kaiea Spring Batts, by and through their undersigned counsel, hereby move, in the alternative to denying Defendants' Motion to Dismiss, for permission to conduct jurisdictional discovery. The grounds for the motion are set out in Plaintiff's Memorandum in Opposition to Defendants' Motion to Dismiss and Plaintiffs' Memorandum in Support of Plaintiff's Motion for Jurisdictional Discovery, as well as all other pleadings and documents in the record.

*[signature page to follow]*

Respectfully Submitted,

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-and-

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November 21, 2023